UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

SUSAN E. COOPER, ELLEN F. PRICE, MARY FLINT PARDI, DAVID B. FLINT and MARILYN A. FLINT, individually and as agents for all former shareholders of Flint Ink Corporation

07-CV-7729 (DC)

Plaintiffs,

MOTION TO ADMIT COUNSEL PRO HAC VICE

-against-

ASTER ZWEITE BETEILIGUNGS GmbH,

Defendant.

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kevin M. Ashby, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name:

KEVIN B. HIRSCH

Firm Name:

Jaffe, Raitt, Heuer & Weiss, a Professional Corporation

Address:

27777 Franklin Road, Suite 2500

City/State/Zip:

Southfield, MI 48034-8214

Phone Number:

(248) 351-3000

Fax Number:

(248) 351-3082

Kevin B. Hirsch is a member in good standing of the Bar of the State of Michigan. There are no pending disciplinary proceedings against Kevin B. Hirsch in any State or Federal court.

Dated:

September 17, 2007

City, State:

New York, N.Y.

Respectfully Submitted

Kevin M. Ashby

Milbank, Tweed, Hadley & McCloy LLP

1 Chase Manhattan Plaza New York, NY 10005

Phone:

(212) 530-5010

Fax Number:

(212) 822-5010

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

SUSAN E. COOPER, ELLEN F. PRICE, MARY FLINT PARDI, DAVID B. FLINT and MARILYN A. FLINT, individually and as agents for all former shareholders of Flint Ink Corporation

07-CV-7729 (DC)

Plaintiffs,

AFFIDAVIT OF KEVIN M. ASHBY IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

-against-

ASTER ZWEITE BETEILIGUNGS GmbH,

			Defendant.
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State of New York)		
)	ss:	
County of New York)		

Kevin M. Ashby, being duly sworn, hereby deposes and says as follows:

- 1. I am associated with the law firm of Milbank, Tweed, Hadley & McCloy LLP, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Kevin B. Hirsch as counsel pro hac vice to represent Plaintiffs in this matter.
- 2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on September 28, 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Kevin B. Hirsch since 2007.
- 4. Mr. Hirsch is an associate of the firm of Jaffe, Raitt, Heuer & Weiss, a Professional Corporation, in Southfield, Michigan.
- 5. I have found Mr. Hirsch to be a skilled attorney and a person of integrity. He is experienced in Federal Practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Kevin B. Hirsch, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Kevin B. Hirsch, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Kevin B. Hirsch, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

Dated: September 17, 2007

New York, N.Y.

Notary Public, In and For the State of New York

Kevin M. Ashby

Respectfully submitted,



UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

SUSAN E. COOPER, ELLEN F. PRICE, MARY FLINT PARDI, DAVID B. FLINT and MARILYN A. FLINT, individually and as agents for all former shareholders of Flint Ink Corporation

07-CV-7729 (DC)

Plaintiffs,

CERTIFICATE OF SERVICE

-against-

ASTER ZWEITE BETEILIGUNGS GmbH,

Defendant.

I hereby certify that a true and correct copy of (1) the Motion to Admit Kevin B. Hirsch Pro Hac Vice and (2) Affidavit of Kevin M. Ashby In Support Thereof, was sent to all known counsel of record by email and hand delivery on this 17th day of September, 2007.

Kevin M. Ashby

Dated: September 17, 2007